

## Remarks

### I. Summary of the Office Action

Claims 1, 2, 6-18, 20-37, 40-43, 45-48, and 50-53 are pending in the application.

Claims 1, 2, 6-18, 20-34, 36, 37, 40-43, 45-48, and 50-53 are rejected under 35 U.S.C. § 102(e) as being anticipated by Srinivasan et al. U.S. Patent No. 6,357,042 (hereinafter "Srinivasan").

Claim 35 is rejected under 35 U.S.C. § 103(a) as being obvious over Srinivasan.

### II. Summary of Applicants' Reply

Applicants have amended claims 1, 6-10, 12-14, 18, 26-28, 32-37, 40-43, 46-48, and 52-53 to more particularly define the subject matter of the claimed invention. Applicants have also added new claims 54-63 and cancelled claims 11 and 25 without prejudice. Support for these amendments may be found throughout the specification, e.g., at page 10, lines 18-21; page 12, line 30 to page 13, line 2; page 14, lines 18-22; and page 15, lines 19-34\*. No new subject matter has been added.

The Examiner's rejections are respectfully traversed. Applicants respectfully request that these rejections be withdrawn.

### III. Applicants' Reply to the Claim Rejections

Claims 1, 2, 6-18, 20-34, 36, 37, 40-43, 45-48, and 50-53 are rejected under 35 U.S.C. § 102(e) as being

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\* The recitation of support is not intended to be exhaustive. Support may be found elsewhere in the specification.

anticipated by Srinivasan. Claim 35 is rejected under 35 U.S.C. § 103(a) as being obvious over Srinivasan. These rejections are respectfully traversed.

Amended independent claim 1 is directed toward a method for providing metadata-selected advertisements to user equipment. A plurality of advertisements relating to at least one object in media are received at the user equipment. The received media include the at least one object, metadata associated with the at least one object, and metadata associated with the plurality of advertisements that are related to the at least one object. The media and the at least one object are displayed on a viewing device at the user equipment. A user selection of one of the at least one object displayed on the viewing device is received. Metadata associated with the selected object is processed and compared at the user equipment with metadata associated with the plurality of advertisements related to the object. One of the plurality of advertisements related to the object is selected from the plurality of advertisements at the user equipment based on the comparison.

Applicants submit that Srinivasan fails to show or suggest at least: 1) receiving at user equipment a plurality of advertisements related to at least one object 2) comparing at the user equipment metadata associated with a user-selected object with metadata associated with the plurality of advertisements, and 3) selecting one of the plurality of advertisements at the user equipment based on the comparison, as specified by amended independent claim 1.

Applicants' claimed approach for providing metadata-selected advertisements, as defined by amended

independent claim 1, is fundamentally superior to Srinivasan's approach for providing personalized advertisements. For example, Srinivasan refers to selecting advertisements for a user based on user profile information, storing URLs for the selected advertisements in metadata, and pulling the advertisements from the internet using the URLs stored in the metadata. (See, e.g., Srinivasan, column 32, lines 22-40). In contrast, applicants' amended claim 1 specifies that an advertisement is selected from a plurality of advertisements received at the user equipment by comparing metadata containing a description of a user-selected object with metadata associated with the plurality of advertisements received at the user equipment. Applicants' dynamic selection of advertisements may obviate the need to associate each advertisement with a URL, together with the possibly cumbersome task of keeping URLs stored in metadata in sync with the internet locations of advertisements. Furthermore, applicants' claimed approach of selecting from a plurality of advertisements received at the user equipment provides several advantages over Srinivasan. For example, 1) advertisements related to user-selected objects may continue to be accessible even during network outages, 2) latency between selecting an object and presenting the related advertisement to the user may be substantially reduced, and 3) delivery of the plurality of advertisements to the user equipment may be planned to reduce, for example, peak-time network traffic.

In response to applicants' prior arguments, the Examiner has maintained the rejection over Srinivasan, contending that Srinivasan discloses comparing metadata containing a description of a user-selected object to

metadata associated with a plurality of advertisements and selecting an advertisement based on the comparison, and citing several sections of Srinivasan<sup>†</sup> for support. (See, e.g., Office Action, page 3, lines 15-19). However, none of the sections of Srinivasan cited by the Examiner provides support for the purported disclosure.

Specifically, the Examiner's contention that Srinivasan selects advertisements based on a metadata-embedded description of a selected object is unsupported by Srinivasan. Although Srinivasan makes references to providing "additional network-stored information about an entity" for display by the user equipment (see Srinivasan, column 7, lines 38-48), Srinivasan does not show or suggest anywhere that this information is used to select advertisements when the user selects the entity.

For at least the reasons listed above, applicants submit that amended independent claim 1 is allowable over Srinivasan. Amended independent claims 18, 32, 36, 37, 43, 48, and 53 are also allowable for at least the same reasons provided in support of independent claim 1. Dependent claims 2, 6-10, 12-17, 20-24, 26-31, 33-35, 40-42, 45-47, 50-52, and 54-63 are allowable for at least the reason they depend from allowable independent claims 1, 18, 32, 36, 37, 43, and 48.

#### IV. Conclusion

For at least the foregoing reasons, applicants respectfully submit that this application is in condition

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<sup>†</sup> Cites include column 7, lines 32-48; column 12, lines 21-32; column 32, line 21 to column 33, line 3; column 36, lines 10-25; and column 37, lines 1-8.

for allowance. Reconsideration and prompt allowance of this application are respectfully requested.

Respectfully submitted,



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